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January 9, 2025

BY ECF

Hon. Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Maria Ruscelli v. The Department of Education of the City of New York
23-CV-07475-LB

Dear Judge Donnelly:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for the Defendant, The Department of Education of the City of New York, in the above-referenced action.

The parties write jointly, in accordance with Your Honor's Individual Rules, to respectfully request an extension of time for Plaintiff to file an amended complaint, from January 15, 2025, to February 14, 2025. The parties also request that Defendant be permitted to file its response to that amended complaint on March 14, 2025.

This is Plaintiff's first request for an extension of time to file an amended complaint. The parties agreed to this proposed schedule.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Madeleine A. Knutson

Madeleine A. Knutson, Esq.
Assistant Corporation Counsel

cc: Maria Ruscelli (by email and mail)